

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT CLARKSBURG**

JOHN KNOTTS,

Plaintiff,

v.

CIVIL ACTION NO. 1:18-cv-00185-TSK

**YORBA CAPITAL MANAGEMENT LLC
and DANIEL PORTILLA,**

Defendants.

**PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT AND
RELEASE, IMPOSE SANCTIONS, AND AWARD ATTORNEY'S FEES**

Plaintiff John Knotts, by counsel, moves the Court to enforce the parties' Settlement Agreement and Release, impose sanctions against Defendants Yorba Capital Management LLC and Daniel Portilla for their breach of the Settlement Agreement and Release, and award him attorney's fees incurred in prosecuting this motion. A memorandum in support of this motion is attached.

WHEREFORE, Plaintiff John Knotts prays that the Court grant his motion to enforce the parties' Settlement Agreement and Release, impose sanctions against Defendants Yorba Capital Management LLC and Daniel Portilla for their breach of the Settlement Agreement and Release, award him attorney's fees

incurred in prosecuting this motion, and grant any other relief the Court deems just and proper.

JOHN KNOTTS
By Counsel

/s/ Jeffrey V. Mehalic
Jeffrey V. Mehalic (WV State Bar No. 2519)
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Counsel for Plaintiff John Knotts

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CERTIFICATE OF SERVICE

I, Jeffrey V. Mehalic, hereby certify that on this 11th day of June, 2019, I electronically filed the foregoing using the CM/ECF system and served the following unrepresented parties by depositing true copies thereof in the United States mail, postage prepaid, addressed to them at their last known addresses as listed below:

Yorba Capital Management LLC
5528 E. La Palma Avenue, Suite 3A
Anaheim, CA 92087

Daniel Portilla
5528 E. La Palma Avenue, Suite 3A
Anaheim, CA 92087

/s/ Jeffrey V. Mehalic

Jeffrey V. Mehalic (WV State Bar No. 2519)